

EXHIBIT A

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF WASHTENAW

BRANDON MIS,

Plaintiff,

-VS-

**GREYHOUND LINES, INC., and
NATHANIEL GRIFFIN, Jointly & Severally,**

Defendants.

23-001318-NI

File No. 23 NI

Hon. JUDGE TIMOTHY P. CONNORS

Adrienne D. Logeman (P63997)
LOGEMAN, IAFRATE & LOGEMAN, P.C.
Attorneys for Plaintiff
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COMPLAINT

"There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in this Complaint."

/s/ Adrienne D. Logeman
ADRIENNE D. LOGEMAN (P63997)

COMPLAINT

Plaintiff, **BRANDON MIS**, by and through **LOGEMAN, IAFRATE & LOGEMAN, P.C.**, by Adrienne D. Logeman, on information and belief complains as follows:

1) Plaintiff is a resident of the County of Washtenaw, State of Michigan.

2) Defendant, **NATHANIEL GRIFFIN**, is a resident of the State of Illinois.

3) The amount in controversy is within the jurisdiction of this Court by reason of a claim for damages in whatever amount in excess of \$25,000.00 Plaintiff is found to be entitled by the finders of fact.

4) At all times relevant therein, Defendant **GREYHOUND LINES, INC.**, was the sole and exclusive owner of a bus being driven by employee/Defendant **NATHANIEL GRIFFIN**, at the time of the accident.

5) That on June 26, 2023, the Plaintiff was struck by the bus while crossing the road as a pedestrian in Ann Arbor, Michigan.

6) The Defendant, **NATHANIEL GRIFFIN**, breached the following duties of care:

- a) The duty to operate the motor vehicle upon the roadway in a manner and at a rate of speed which would permit it to be brought to a stop within the assured clear distance ahead, as contemplated by MCLA 257.627(1);
- b) Drove said vehicle in a careless and heedless manner with willful and wanton disregard of the safety or rights of others, as contemplated by MCLA 257.626(a);
- c) Duty to keep the automobile constantly under control;

- d) Duty to drive said vehicle upon a roadway with due diligence and circumspection, so as not to endanger or be likely to endanger other persons or property, as provided by MCLA 257.626(a);
- e) The duty to attempt to stop said vehicle when Defendant knew or should have known that such failure would naturally and probably result in injury to the Plaintiff;
- f) Duty to look at, see and observe the highway in front of said Defendant's vehicle when Defendant knew or should have known that such failure would endanger the life or property of others using the roadway;
- g) Duty to yield to pedestrians who had the right-of-way in the roadway.

7) As a direct and proximate result of the negligence of the Defendant, Plaintiff suffered serious injury and/or aggravation of some pre-existing condition and may in the future suffer or may permanently suffer mental anguish, pain and suffering, injuries and limitations, including serious impairment of body function, some of which said injuries are, but not exclusively, as follows:

- a) Traumatic brain injury, broken ribs and broken collarbone, well as other related and appreciable difficulties and consequences;
- b) Pain, suffering and mental anguish;
- c) Wage loss or actual future loss of earnings to the extent that such losses are recoverable in excess of the no fault statutory monthly and yearly maximums as found applicable to the cause;

- d) Loss of services;
- e) Medical care;
- f) Such other damages, injuries and consequences as found to be related during the course of discovery and recoverable under the Michigan No Fault Act.

WHEREFORE, Plaintiff, **BRANDON MIS**, seeks damages against the Defendants, **GREYHOUND LINES, INC.**, and **NATHANIEL GRIFFIN**, in whatever amount in excess of \$25,000.00 Plaintiff is found to be entitled, plus interest, costs and attorney fees.

DATED: October 18, 2023

/s/ Adrienne D. Logeman

Adrienne D. Logeman (P63997)

LOGEMAN, IAFRATE & LOGEMAN, P.C.

Attorneys for Plaintiff

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